

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Amendment of Parts 2 and 25 of the )  
Commission's Rules To Allocate Spectrum in )  
The 14-14.5 GHz Band to the Aeronautical )  
Mobile-Satellite Service ("AMSS") and To )  
Adopt Licensing and Service Rules for AMSS )  
Operations in the Ku-Band )

**COMMENTS OF ROCKWELL COLLINS CORPORATION**

Rockwell Collins Inc. ("Rockwell Collins") hereby submits comments in the above-captioned proceeding in response to the Petition for Rulemaking ("Petition") filed by The Boeing Company ("Boeing"), requesting amendment of Parts 2 and 25 of the Commission's rules to allocate the Aeronautical Mobile-Satellite Service ("AMSS") in the 14-14.5 GHz band on a secondary basis and to adopt licensing and service rules for AMSS operations in the Ku-Band.<sup>1</sup>

Rockwell Collins is a party in interest to this proceeding because it is a major manufacturer and marketer of aeronautical satellite communications systems. Rockwell Collins manufactures and markets five different commercial aeronautical satellite communications systems for both the air transport and general aviation markets. Rockwell Collins is teaming with Boeing to provide high-speed connectivity to the business aviation markets through Rockwell Collins' eXchange<sup>sm</sup> product via Connexion by Boeing<sup>sm</sup> ("Connexion").<sup>2</sup>

Rockwell Collins supports Boeing's Petition for the Commission to establish licensing and service rules for AMSS services. Rockwell Collins also supports Boeing's proposed

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<sup>1</sup> See Petition for Rulemaking of the Boeing Company, RM-10800 (filed July 21, 2003) ("Boeing Petition").

<sup>2</sup> Rockwell Collins Inc., *News Release* (Oct. 7, 2003) (available at <http://www.rockwellcollins.com/newsroom/pressreleases/viewContent.asp?ContentID=4121>).

licensing and service rules for such service. Providing aircraft passengers broadband communications services utilizing satellites in the Ku-band Fixed Satellite Service is a public benefit important to the future of the aviation industry. The Commission has made it an objective to encourage and facilitate an environment that stimulates investment and innovation in broadband technology and services so that broadband services can be provided to all Americans.<sup>3</sup> The current process of regulating by waiver is extremely inefficient and expensive, delaying deployment for and incurring additional costs to manufacturers, service providers and the traveling public.

Rockwell Collins joins Boeing in recommending that the Commission initiate a rulemaking proceeding to amend Parts 2 and 25 of its Rules to allocate AMSS in the 14-14.5 GHz band on a secondary basis, and to adopt Boeing's proposed licensing and service rules for AMSS operations in the Ku-band.

Respectfully submitted,

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<sup>3</sup> See <http://www.fcc.gov/broadband/> for a listing of the Commission's strategic goals regarding Broadband service.